

## Agenda Item # 11.C.



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR

### BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

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DATE: May 8, 2009

TO: Board Members

FROM: Cheryl C. Anderson, M.S., R. N.  
Nursing Education Consultant

SUBJECT: CSI Career College, Vacaville, Vocational Nursing Program –  
Consideration of Placement on Provisional Accreditation (Director: Jennifer  
Cannon, Vacaville, Solano County, Private)

CSI Career College, Vacaville, Vocational Nursing Program is presented to the Board for consideration of placement on provisional accreditation.

In accordance with Section 2526.1(c) of the Vocational Nursing Rules and Regulations,

“The Board may place any program on provisional accreditation when a program does not meet all requirements as set forth in this chapter and in Section 2526...”

Section 2530(I) of the Vocational Nursing Rules and Regulations states:

“The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation.”

The following table shows the variance of the program’s pass rates from the state average annual pass rates of first time graduates of accredited vocational nursing programs for the past nine (9) quarters. This data substantiates the program’s noncompliance with Section 2530(I) of the Vocational Nursing Rules and Regulations.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jan – Mar 2007	77%	33%	- 44
Apr - Jun 2007	77%	65%	- 12
Jul –Sep 2007	76%	61%	- 15
Oct – Dec 2007	76%	63%	- 13
Jan – Mar 2008	75%	56%	- 19
Apr - Jun 2008	74%	42%	- 32
Jul - Sep 2008	74%	42%	- 32
Oct – Dec 2008	73%	39%	- 34
Jan – Mar 2009	72%	55%	-17

### **History of Prior Board Actions**

- On August 17, 2005, CSI Career College was approved to begin a vocational nursing program with an initial class of 30 students commencing October 3, 2005, only. Additionally, the program curriculum for 1620 hours, including 630 theory, and 990 clinical hours was approved.
- On September 8, 2006, the program was approved for initial full accreditation for the period September 8, 2006, through September 7, 2010, and issued a certificate accordingly.

The program's request was approved to admit 45 students commencing January 16, 2007, only, and graduating December 15, 2007. This class replaced students who graduated December 20, 2006. In so doing, the program's class size increased from 30 to 45 students.

- On June 5, 2007, the Executive Officer approved CSI Career College, Vacaville, Vocational Nursing Program's request to commence a 60-week evening class commencing June 18, 2007, only, graduating January 2009, with a class of 30 students; and approved the program's request for ongoing admissions in day classes with a maximum of 45 students per class to replace graduating classes only, with the following stipulations:
  - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes one class of 45 students admitted in January of each calendar year; and
  - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.

- **On July 6, 2007, a new program director was approved.**
- On January 10, 2008, Board staff was notified of the director's resignation effective December 31, 2007.
- **On January 15, 2008, a new program director was approved.**
- On February 13, 2008, the program was notified that its annual average pass rate had fallen below 10 percentage points of the state annual average pass rate for the past four (4) quarters. The program was requested to submit a written plan for improving their NCLEX-PN® pass rates by March 13, 2008.
- On April 21, 2008, Board staff was notified of the director's resignation, effective immediately.
- On May 6, 2008, the program was notified that its annual average pass rate had fallen below 10 percentage points of the state average annual pass rate for the past five (5) quarters.
- **On May 20, 2008, a new program director was approved.**
- On June 4, 2008, the program was issued a Notice of Violation for its assignment and completion of rotations in clinical facilities without prior Board approval. The program was requested to submit a detailed statement explaining how and why the violation occurred and planned actions to prevent reoccurrences.
- On June 13, 2008, Board staff was notified of the director's termination effective immediately.
- On June 17, 2008, the program submitted a plan of correction addressing the violation cited on June 4, 2008.
- **On June 18, 2008, a new program director was approved, effective July 1, 2008.**
- On September 16, 2008, the program was notified that its annual average pass rate had fallen below 10 percentage points of the state annual average pass rate for the past six (6) quarters. The program was requested to submit documentation that verified that the elements of its plan of correction were being carried out and the effects of the employed interventions on or before October 16, 2008.
- On September 23, 2008, Board staff was notified of the director's termination.
- **On September 25, 2008, a new program director was approved.**

- On October 29, 2008, the assigned consultant met with the new program director relative to its plan for improving pass rates and other critical areas impacting student achievement.
- On November 17, 2008, the program submitted a revised plan of correction to address its low pass rates.
- In preparation for the December 2008 report, inconsistencies were noted between enrolled classes as approved by the Board and the program's enrollment data. Clarification was provided by the director. The program's approved curriculum includes prerequisite and nursing classes. The actual length of day classes (prerequisite and nursing classes) is 14 months. The actual length of evening classes (prerequisite and nursing classes) is 17 months.
- On November 18, 2008, the program was notified that its annual average pass rate had fallen below 10 percentage points of the state annual average pass rate for the past seven (7) quarters.
- On December 8, 2008, Executive Officer **denied** the program's request to increase the size of its 17-month evening class from 30 to 45 students. Additionally, the program's request for ongoing admissions in its evening classes was **denied**. The program must have prior Board approval to admit evening classes.
- On March 16, 2009, the program was notified that its annual average pass rate had fallen below 10 percentage points of the state average annual pass rate for the past eight (8) quarters.
- On March 18, 2009, the Executive Officer approved CSI Career College, Vacaville, Vocational Nursing Program's request to admit 30 students into its evening class commencing April 20, 2009 only, with an anticipated graduation of September 27, 2010. The proposed class would **replace** students who completed program requirements on December 20, 2008. Additionally, the program was placed on the May 22, 2009, Board meeting agenda for consideration of placement on provisional accreditation based on the performance of program graduates on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®).

### **Enrollment**

Currently, the program is approved to admit a day class of 45 students each January, only, to **replace** graduating students. The day class is 14 months in length. Additionally, the program requires prior Board approval to admit evening classes. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on current and proposed class starts and completions. The table indicates **a maximum enrollment of 99 students** for the period from June 2007 through April 2009.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
6/07 (PM Class)		30	23	<b>23</b>
8/07 (AM Class)		45	33	23 + 33 = <b>56</b>
8/08 (AM Class)		45	43	56 + 43 = <b>99</b>
	12/08 (6/07 PM Class)		- 23	99 - 23 = <b>76</b>
	12/08 (8/07 AM Class)		- 33	76 - 33 = <b>43</b>
4/09 (PM Class)		30		43 + 30 = <b>73</b>

### Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period January 2007 through March 2009, specify the pass percentage rates for graduates of CSI Career College, Vacaville, Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data						
Quarterly Statistics					Annual Statistics*	
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate
Jan – Mar 2007	3	1	33%	77%	33%	77%
Apr – Jun 2007	17	12	71%	74%	65%	77%
Jul – Sep 2007	3	1	33%	76%	61%	76%
Oct – Dec 2007	1	1	100%	76%	63%	76%
Jan – Mar 2008	24	11	46%	75%	56%	75%
Apr – Jun 2008	10	3	30%	70%	42%	74%
Jul – Sep 2008	1	0	0%	74%	42%	74%
Oct – Dec 2008	1	0	0%	73%	39%	73%
Jan – Mar 2009	10	9	90%	70%	55%	72%

\*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three quarters by the number of candidates who tested during the same period.

Based on the most current data available (January–March 2009), the program's average annual pass rate is 55%. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time is 72%. The average annual pass rate for CSI Career College, Vacaville, Vocational Nursing Program is seventeen percentage points **below** the state average annual pass rate.

### **Faculty and Facilities**

Section 2534(d) of the Vocational Nursing Rules and Regulations states:

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

The total number of Board - approved faculty is thirteen (13), including the program director. The director has 100% administrative duties. Of the total faculty, thirteen (13) are approved to teach in the clinical area. For a maximum enrollment of 99 students, seven (7) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

Section 2534 (b) of the Vocational Nursing Rules and Regulations states:

"Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught."

The program has clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534 (b) of the Vocational Nursing Rules and Regulations. This information has been verified by the consultant.

### **Other Considerations**

As noted above, the program has had substantial instability in the position of program director. Additionally, the performance of program graduates on the NCLEX-PN® is substantially below the state average.

The current director was hired and approved on September 25, 2008. The director works half time and has 100% administrative duties.

On October 29, 2008, the assigned consultant met with the new director relative to the previously submitted plan addressing program pass rates, steps taken to improve pass

rates, and other critical areas impacting student achievement. A number of modifications were recommended.

A marked improvement in program administration was identified. The director reported that the following critical actions had been completed.

1. Evaluations of all current instructors were completed.
2. Several new experienced instructors were hired.
3. All students were evaluated using Assessment Technologies Institute (ATI) assessment examinations. Students with theory and clinical deficits were identified. Remediation plans were established and implemented to address students' identified deficits.

On November 17, 2008, the program submitted a revised plan of correction (see Attachment A). As specified therein, several goals addressed the low pass rates of program graduates on the NCLEX-PN®. Plans for implementation and a project timeline were developed. Additionally, plans for correcting the theory and knowledge deficits of currently enrolled students and a timeline were established.

As noted previously, inconsistencies were identified between the enrolled classes as approved by the Board and the program's enrollment data. The program's approved curriculum includes prerequisite and nursing classes. The director clarified that prerequisite classes include Mathematics, English, Computer Literacy, Anatomy & Physiology, Terminology, and Nutrition. The actual length of day classes (prerequisite and nursing classes) is 14 months. The actual length of evening classes (prerequisite and nursing classes) is 17 months.

The following violation is identified.

**Section 2530(l) states:**

**"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.**

- (1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."**

**Violation:** The program's average annual pass rate has been more than ten percentage points below the state average annual pass rate for eight (8) consecutive quarters.

### **Plan of Correction:**

This violation is **not corrected**. The violation will be corrected when the program's pass rates improve and are consistent with regulatory requirements.

On November 17, 2008, the program submitted a revised report relative to its plan for improving its pass rates. Eleven (11) candidates have tested since the implementation of that plan. Of those candidates, nine (9) passed.

On March 16, 2009, the consultant notified the program that its annual average pass rate on the NCLEX/PN<sup>®</sup> had fallen below 10 percentage points of the state average annual pass rate for eight (8) quarters.

### **Recommendations:**

1. Place CSI Career College, Vacaville, Vocational Nursing Program on provisional accreditation for the two-year period from May 22, 2009, through May 21, 2011, and issue a notice to the program to identify specific areas of non compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see Attachment B).
2. Require the program to submit a follow-up report in 11 months but no later than May 21, 2010. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.
  - a. Admission Criteria.
  - b. Screening and Selection Criteria.
  - c. Terminal Objectives.
  - d. Curriculum Objectives.
  - e. Instructional Plan.
  - f. Theory and Clinical Objectives for Each Course.
  - g. Lesson Plans for Each Course.
  - h. Textbooks.
  - i. Attendance Policy.
  - j. Remediation Policy.
  - k. Evaluations of Theory and Clinical Faculty.
  - l. Evaluations of Theory Presentations.
  - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
  - n. Evaluation of Student Achievement.

**Rationale:** The Board has serious concerns relative to the program's non-compliance with regulations relative to pass rate on the NCLEX-PN<sup>®</sup> for the last nine (9) quarters. The current program director has implemented a revised



plan to improve the pass rates of program candidates. Of the eleven (11) candidates impacted by the revised plan, nine (9) passed.

Attachment A – Program correspondence dated November 14, 2008.

Attachment B – Notice of Change in Accreditation Status